

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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WILLIS TOWERS WATSON PUBLIC LIMITED  
COMPANY and WILLIS RE INC.,

21-CV-00487 (JMF)

Plaintiffs,

v.

PAUL HERRIOTT,

Defendant.  
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**DECLARATION OF GLORIA H. EVERETT**

Gloria H. Everett, declares under penalty of perjury as follows:

1. I am the President and Chief Executive Officer of The Mutual Risk Retention Group, Inc. (“The Mutual”). I have personal knowledge of the facts stated in this declaration.

2. The nature of the relationship between me and Paul Herriott is one of friendship. Simply by way of example to illustrate the nature of our personal friendship, he and his wife hosted a fundraiser at their home in December 2017 after my home had been destroyed in the California wildfires two months before. We attend the same church and live in the same community.

3. On occasion, we get together socially, most recently at my club, and we spend our time talking about family, colleges, college tuition, community and political issues, and my frustration with rebuilding our home.

4. Until recently, Willis Re, Inc. (“Willis Re”) had been the Broker of Record for The Mutual. I had the responsibility on behalf of The Mutual for working with Willis Re on reinsurance matters. Joel Wendland, and subsequently also Joe Reitzel, were the Willis Re brokers who represented and were responsible for The Mutual’s account. My relationship with Paul has been one of friendship for at least the last 10 years.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Dated: Napa, California  
March 16, 2021



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Gloria H. Everett